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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 27, 1993

In the Matter of
Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing Them

PR Docket 92-235

TO: THE COMMISSION

The International Bridge, Tunnel and Turnpike Association (IBTTA) represents fifty United States toll agency members operating almost 5,00 miles of toll bridges, tunnels and turnpikes in thirty one states. We wish to express our concern regarding the operational and financial impact on the toll industry should the Notice of Proposed Rulemaking (NPRM), regarding possible changes in the allocation of radio spectrum below 800 MHz (refarming) be pursued by the Federal Communications Commission (FCC), as currently written.

The Association reviewed the Proposed Part 88 and the Consensus Plan developed by the Land Mobile Communication Council (LMCC). We strongly encourage the FCC to adopt and follow the Consensus Plan offered by the LMCC, representing users of land mobile radio and providers of land mobile services and equipment.

IBTTA believes that this LMCC migration plan, both UVF and VHF option A, would be a positive approach better reflecting the telecommunication needs unique to the toll industry while addressing potential adverse financial effects.

The LMCC approach for determining power levels and defining system coverage, especially toll facility services operating predominately as a ribbon- type system, is far more realistic. Conversely, the approach outlined in the NPRM, setting a maximum ERP power limitation, would require a significant increase in the number of fixed-base station sites let alone the corresponding facilities to interconnect these additional sites. Meeting the necessary capital expenditures to build, operate and maintain such additions, could be cost-prohibitive for most toll agencies.

IBTTA requests further, that the Commission consider establishing frequency assignment pairing in the VHF band (150 - 174 MHz) at this time as well. We believe this could be accomplished when moving from today's 15 KHz to the proposed 12.5 bandwidths. A majority of IBTTA members utilize mobile relays due primarily to the great distances they are required to cover. The current lack of pairing is a major cause of inter-system interference currently experienced. Thus, the lack of pairing at VHF would only further complicate any attempt to attain effective and exclusive use in the band.

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IBTTA agrees with the basic goals found in this NPRM and applauds the Commission in this effort. In order to fully benefit from such refarming initiatives, the LMCC Consensus Plan and our pairing request need to be simultaneously pursued and implemented.

Thank you for your consideration.

Respectfully submitted,



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and Turnpike Association
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copies to:

APCO Inc.
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Land Mobile Communication Council
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